

164377 Joe - info



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RECEIVED
NORRISTOWN

APR 24 1986

21 April 1986

Mr. Robin Aitken
Environmental Engineer
U. S. Environmental Protection Agency
841 Chestnut Building (3HW14)
Philadelphia, PA 19107

Re: NVF Company
Technical Products Division
Kennett Square Plant
PCB Discharge Evaluations

Dear Mr. Aitken:

On behalf of NVF Company (Company), I should like to express my appreciation for your forthrightness and assistance as regards the Kennett Square plant PCB situation at our meeting on April 15, 1986.

As we explained to you and Ms. Steele of PADER, the Company acknowledges its use of Arochlor 1248 (PCB) Compounds as found in the swale and NVF tributary during its operational history prior to 1968. However, the presence of other PCB Compounds in the NVF tributary and swale is the cause of some concern to us as it is well known that the fires, respectively, in the Noznesky junkyard, next door to the plant, and the lumber yard were potentially responsible for their presence. We believe that through the copious use of water on these fires by the fire department, these other PCB Compounds travelled considerable distances in the surrounding water courses because of the flatness of the terrain around the junkyard, especially.

Our attempts to acquire some equitable resolution of this matter with PADER have not been successful. We now see that it has been referred to your agency for further processing.

The Company recognizes that it has a responsibility to fulfill as regards site remediation for PCBs in the local watercourses, particularly. However, they continue to assert their request for proper adjudication of this matter vis-a-vis PCBs in the watercourses from other known sources.

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In good faith, moreover, the Company is prepared to move forward with certain actions aimed at defining the battery limits of the proposed clean-up if not the clean-up itself:

- The Company will install a siltation dam at the mouth of the NVF tributary before flow enters the West Branch of Red Clay Creek. This siltation dam will be designed to capture solids during high runoff conditions. A 2 or 5 year storm will be considered for the design of this dam. The time schedule for construction of this dam will be consistent with the acquisition of off-site rights-of-way by Ms. Steele of PA DER.
- The Company will ~~jointly participate in~~ laying out a definitive sampling plan of the area with PADER and yourselves. The plan will be designed to incorporate all of the PCB analytical data collected on the site to date.
- The Company will prepare a cost quotation for the clean-up as it will have been defined at this stage.

Following the acquisition of these additional data, the Company will weigh all aspects of this situation in the context of other legal and business considerations to arrive at a proper course of action.

I trust that the forgoing action plan is satisfactory for your purpose at this time. I'd like to emphasize that the Company does wish to cooperate to the fullest extent of its own culpability in this matter.

Very truly yours,

ROY F. WESTON, INC.

"non responsive based on revised scope"

Vice President

AJD:ldh

cc: Ms. Steele - PA DER
S. Kovach - NVF
W. Witt - NVF
W. Lair - NVF

"non responsive based on revised scope"

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